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October 18, 1995

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OCT 18 1995

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

BY HAND

Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

Re: Permissible Ex Parte Presentation in  
CC Docket No. 94-102

Dear Mr. Caton:

Pursuant to Section 1.1206 of the Commission's rules, this is to inform the Commission that Mr. Martin Moody of Telident, Inc., along with the undersigned, met with the following Commission staff on October 17, 1995, to discuss Telident's position in the above-captioned proceeding as set forth in its prior written comments and reply comments:

Mr. Richard Welch and Mr. David Furth of Commissioner Rachelle Chong's office;

Mr. James Casserly of Commissioner Susan Ness' office;

Mr. John Nakahata of Chairman Reed Hundt's office;

Ms. Lauren Belvin of Commissioner James Quello's office;  
and

Mr. Todd Silbergeld of Commissioner Andrew Barrett's office.

We also presented the staff with certain documents, two copies of which are enclosed for the Commission's files.

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Mr. William F. Caton

October 18, 1995

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Please contact the undersigned if you have any questions.

Respectfully submitted,

WILKES, ARTIS, HEDRICK & LANE  
Chartered

By:

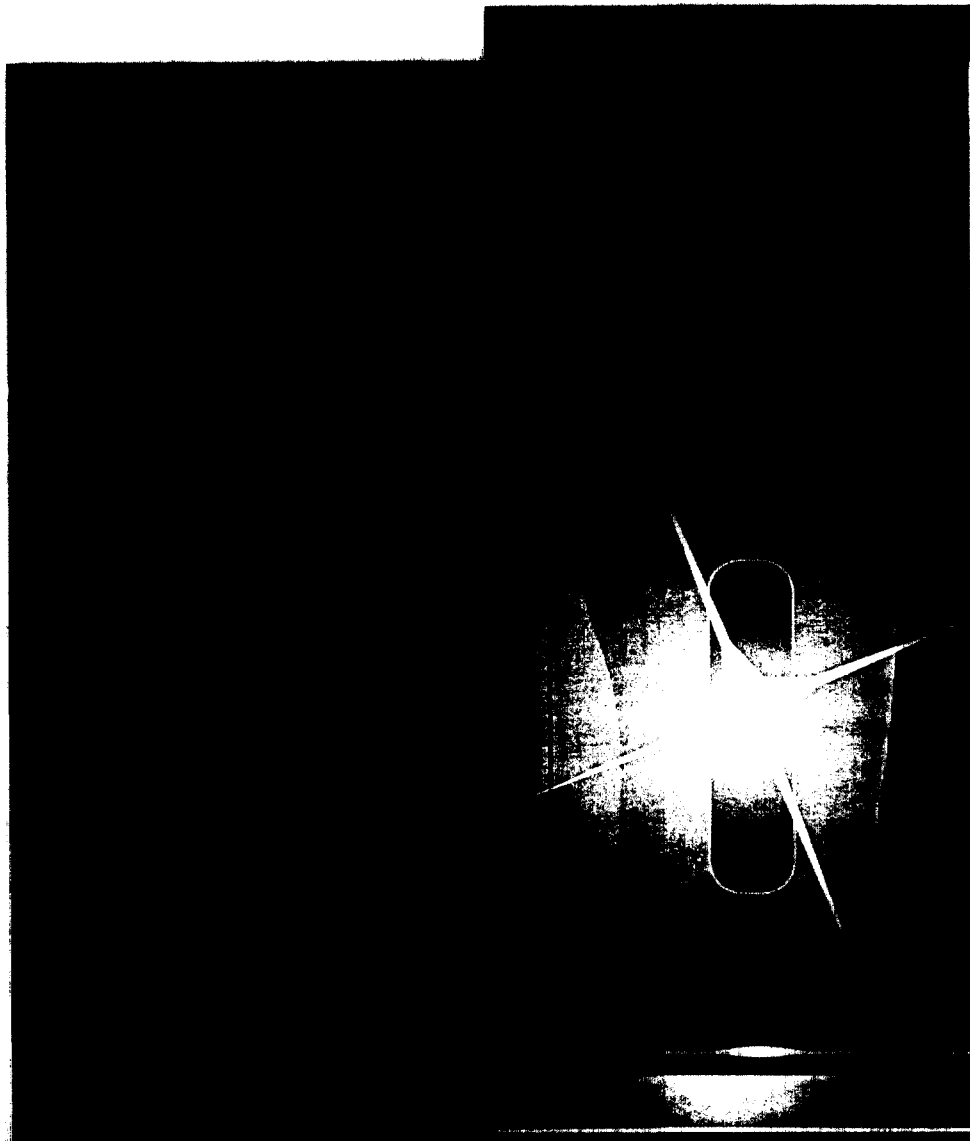
  
Robert M. Gurss

Attorneys for Telident, Inc.

cc: Richard Welch  
David Furth  
James Casserly  
Lauren Belvin  
Todd Silbergeld  
Martin Moody

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C C 94-102



**TELIDENT<sub>INC.</sub>**

*Total Solutions For Managing  
Emergency Information*

## A Total Solution Approach

In an emergency situation, information access and management has to be fast. Efficient. And simple. But making it simple can be complicated, and that's where the Telident total solution comes in.

Enhanced (E) 9-1-1 emergency voice and data communications take place over an extensive network. A network that encompasses both the calling and answering/dispatch ends of the E 9-1-1 call.

In order to function effectively, the E 9-1-1 network requires seamless, reliable call processing and information management from one end of

the network to the other. It demands sophisticated reliable hardware, software and a variety of support services.

What sets Telident apart from all others is our ability to view the entire E 9-1-1 network as a complete system. This perspective has enabled us to gain expertise in every aspect of E 9-1-1 information management. The expertise gained in one area of the network unquestionably enhances our performance and contribution in others.

Our innovative total solution approach is setting the industry standard. This approach is reflected in our consistent outpouring of leading-edge products

and services, unmatched 9-1-1 network voice and data expertise and seamless performance at hundreds of installations coast to coast. We have the unique ability to take something extremely critical – the 9-1-1 emergency system – and provide a simple effective response.

These are the hallmarks of a total solution approach – one that only Telident is equipped to provide. And that's important to remember. Because in an emergency, the best solution is a total solution.

Telident provides

voice and data emergency

information management

products and services for phone

systems and 9-1-1 networks and

public safety agencies.

**TELIDENT**<sub>TM</sub>

**MARTIN D. MOODY**  
VICE PRESIDENT ADVANCED ENGINEER

ONE MAIN STREET SE • SUITE 85 • MINNEAPOLIS, MN 55414  
(800) 536-4911 • (612) 623-0911 • FAX (612) 623-0944

Telident enhances

the compatibility

between telecom,

data transmission and

the E 9-1-1 network.



## Corporate Profile

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### Who we are.

Telident provides products and services enabling information management for emergency events involving the Enhanced (E) 9-1-1 emergency response network, from call placement to receipt of the call in public safety applications.

E 9-1-1 was introduced in the 1970s. Telident came onto the scene just a few years later. Our mission then was no different from our mission now: to protect lives, health, and well-being by developing and marketing advanced hardware, software and services that allow information processing and management in the E 9-1-1 network to approach fail-safe levels of performance.

Our growth in capabilities parallels that of E 9-1-1 emergency telecommunications. As requirements of the E 9-1-1 network have grown more sophisticated, so has our technology. When E 9-1-1 spread into new states and rural areas, we tailored products and services to meet the special needs of those new customers.

With the advent of private phone systems (PBXs) and their resulting incompatibility with the E 9-1-1 network, Telident's innovative culture

responded with what continues to be the standard in PBX/9-1-1 solutions. Even the Centrex environment has given Telident the opportunity to respond with a unique enhancement to user safety.

Today, the range of our expertise covers all aspects of the E 9-1-1 network, and beyond. Examples of areas in which we have expertise include:

- Private phone systems
- Centrex phone systems
- Central/end office technology
- Public safety answering points
- Private campus environments
- Telcos

The broad-based expertise and experience of our employees gives us a distinct advantage in creating integrated, turnkey systems. And solutions.

### Who we serve.

The safety market for Telident products and services falls into three broad categories:

#### Private safety sector

Our turnkey solutions — hardware, software, and services — provide complete compatibility with and access to the E 9-1-1 network for private and Centrex phone systems in:

- Large to mid-size companies
- Colleges and universities
- School districts
- Government offices
- Residential/shared office settings
- Hotels/motels
- Hospitals, medical facilities and nursing homes
- Any organization utilizing — or planning to utilize — a PBX or Centrex phone system

#### Public safety sector

Telident furnishes E 9-1-1 network hardware that provides switching, selective routing, and data interfacing for:

- Telecommunications companies
- State, county, and city government agencies
- Rural public safety agencies
- The customers who depend on these telephone companies and government/safety agencies

Telident also offers a variety of innovative emergency information processing/management software systems for:

- Law enforcement agencies
- Civil processing departments
- Fire departments
- Jails

### Private campus safety sector

For the self-contained, totally or partially self-sufficient campus, Telident has a flexible combination of public and private-sector products and services. Campuses are then able to not only use PBX/9-1-1, but to answer and respond internally to their own 9-1-1 calls. Customers include:

- Corporate campuses
- Educational campuses
- Governmental campuses

### **What we provide.**

The breadth of Telident's product line reflects the full spectrum of emergency information management needs related to the increased emphasis on safety and the associated reliance on E 9-1-1. Products and services currently include:

#### Private safety sector (PBX/9-1-1)

- Patented *9-1-1 Station Translation System (9-1-1 STS)* for PBXs)
- *ALI Database Management Software (ShadowMAX)*
- *ALI Service Bureau*
- *On-Site Notification Software (TRAX OSN)*

### Public safety sector

#### *Hardware*

- *9-1-1 Network Control System* selective router facilitating E 9-1-1 service to rural areas (*9-1-1 NCS*)
- *9-1-1 ANI Control System* interfacing incoming 9-1-1 trunks with PSAP equipment (*9-1-1 ACS*)

#### *Software*

- *Computer-Aided Dispatch System (CAD II)*
- *Local Enhanced ALI (LEALI)*
- *Civil Process Data System*
- *Jail Management Data System*
- *Law Enforcement Records System*
- *Digitized Video Imaging System*
- *Fire Service Records System*

#### Private campus safety sector

Given the unique nature of each campus setting, different combinations of the above private and public system products could be offered. Examples include:

- PBX/9-1-1
- LEALI
- NCS/ACS
- PSAP software and services

### **Where we're going.**

Telident will continue to design cutting-edge products and services by maintaining leadership in the 9-1-1 industry and telecom-related associations and standards committees. We are inspired by the feedback we receive from all of our constituents. Private phone system manufacturers and users. Public safety agencies and trade organizations. Telephone companies. Plus our own customer service, field installation and maintenance personnel.

Because Telident has such long standing relationships and extensive expertise across the broad spectrum of the E 9-1-1 network, we find ourselves uniquely positioned to lead the way in the development and strategic distribution of safety-related information management systems for the 21st century.

By capitalizing on what we've learned, we envision a marketplace that will look to Telident for the innovative solution. The cost-effective solution. And the total solution.

**TELIDENT**<sub>INC.</sub>

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800-536-4911 • 612-623-0911 • Fax 612-623-0944

- ♦ **NATIONAL STANDARDS ARE CRITICAL** for the interoperability and compatibility of Private Branch Exchanges (PBXs) and Dispersed Private Telephone Systems (DPTs) with the existing extensive Enhanced 911 infrastructure.
  - ANSI T1.411-1995 is the Enhanced 911 network interface standard written by Standards Committee T1-Telecommunications, at the request of the Telecommunications Industry Association (TIA) Technical Committee TR-41 (User Premises Equipment). This interface (Facilities Interface Code 02RV2-0) is universally available throughout the United States. Its first usage by a PBX was in 1989.
  - As new network technologies emerge, additional Enhanced 911 network interface standards must be developed.
  
- ♦ **DEDICATED ACCESS** to the Enhanced 911 network from the PBX/DPTS is critical.
  - The 911 call (from behind the PBX/DPTS) must have a route out of the PBX/DPTS regardless of the level of "normal outbound call traffic". At least one path must be dedicated.



♦ **THE PROPOSED RULEMAKING** must encompass the appropriate **EXISTING** PBX/DPTS installations (the "installed base").

- The technology required to implement ANSI T1.411-1995 is available from PBX/DPTS and/or adjunct equipment manufacturers for **EXISTING** installations.
- If all **EXISTING** PBX/DPTS installations are "grandfathered", tens of thousands of PBX/DPTS installations will continue to adversely affect E911 systems. The rate of replacing old systems with new equipment is estimated at 4% per year.
- Any "grandfathering" must be installation specific rather than equipment specific.

♦ **PART 68 AMENDMENTS**

- Amendments to Part 68 should allow the registration of PBX/DPTS options and/or adjunct equipment used to implement the interface defined in ANSI T1.411-1995.
- Note: As other network interface standards are defined for Enhanced 911, other amendments may be required.
- The implementation of ANSI T1.41-1995 should not be a requirement for a PBX/DPTS to be registered under Part 68. That is, not all PBX/DPTS equipment will need the E911 interface.

# American National Standard

for telecommunications -

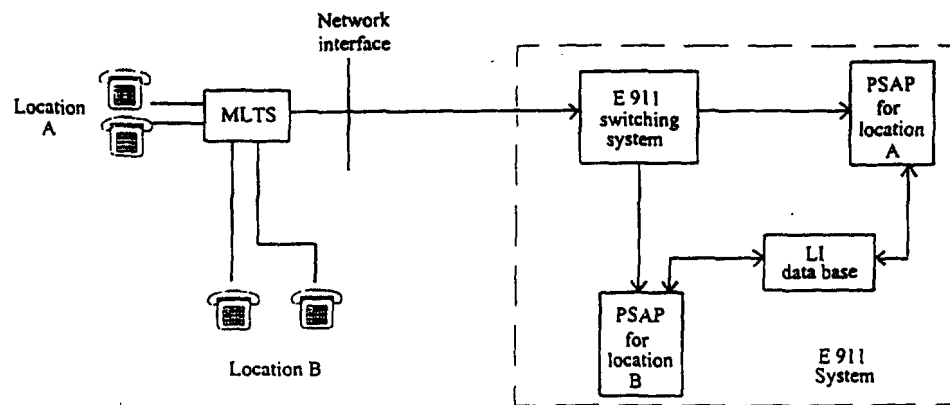
interface between carriers and customer installations -  
analog voicegrade enhanced 911 switched access  
using network-provided reverse-battery signaling

Approved xxxxx YY, xxxx

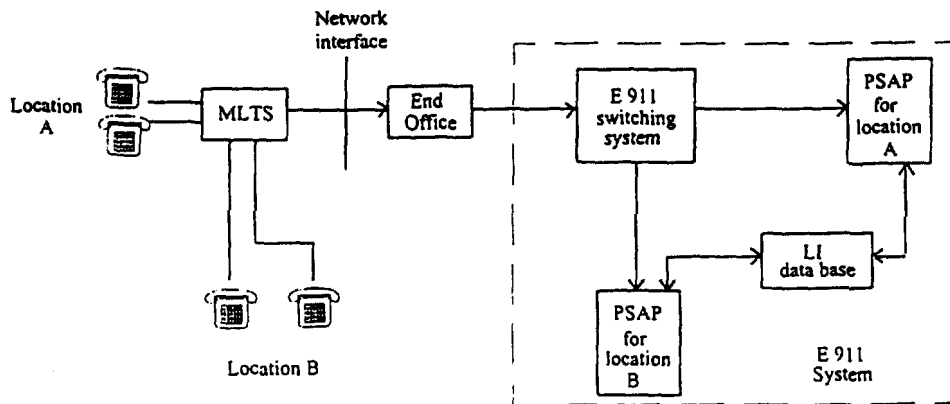
Secretariat: Alliance for Telecommunications Industry Solutions

This supplement changes ANSI T1.411-1995 to clarify the definition of CESID and to allow application of the network interface described in ANSI T1.411-1995 to an end office (automatic operation).

Replace Figure 1 of ANSI T1.411-1995 with the following:



a) Connection to E 9-1-1 switching system tandem



b) Connection to E 9-1-1 switching system through an End Office (automatic operation).

MLTS	=	Multi-Line Telecommunications System
PSAP	=	Public Safety Answering Point
LI	=	Location Identification
Location A	=	MLTS and terminal location
Location B	=	Off-premises terminal location

Figure 1 - Typical MLTS/Enhanced 911 system configurations